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## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:	CASE NO. 16-04482/BKT
JUANA CARO	CHAPTER 7
DEBTOR	

MOTION REQUESTING ORDER OF APPROVAL
RE: DEBTOR'S INTENTION TO PARTICIPATE IN A LOAN MODIFICATION
PROCESS THROUGH LOSS MITIGATION PROGRAM

TO THE HONORABLE COURT:

NOW COMES, JUANA CARO, debtor, through the undersigned attorney, and very respectfully states and prays as follows:

- 1. On June 3, 2016, the debtor filed for protection under Chapter 13 of the Bankruptcy Code, 11 U.S.C. §1301 et seq. The debtor scheduled as one of her assets a real property located at Caguas Urb. Pla 21 Calle Jiménez García Caguas, Puerto Rico. Said property has a lien with creditor Banco Popular de Puerto Rico.
- 2. Due to debtor's financial situation we are notifying this Honorable Court and all creditors of debtor's intention to participate in a loan modification process through a loss mitigation program with secured creditor Banco Popular de Puerto Rico.
- 3. The debtor hereby respectfully submits to the Court that she needs the approval of this Honorable Court to continue the loan modification process through the loss mitigation program with Banco Popular de Puerto Rico. Once said modification is approved by the bank it will be submitted for evaluation to the Trustee in this case and to this Honorable Court for its approval.

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Debtor's Intention to Participate in Loss Mitigation Program

Case no. 16-04482/BKT7

WHEREFORE it is respectfully requested from this Honorable Court that an approval Order upon debtor's intention to modify her mortgage loan through loss mitigation program be entered, in the above captioned case.

## NOTICE

Within fourteen (14) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.

## CERTIFICATE OF SERVICE

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, the US Trustee's Office, and all CM/ECF participants; I also certify that a copy of this notice was sent via regular US mail to the debtor to her address of record; Urb. Pla 21 Calle Jiménez García Caguas, Puerto Rico 00725 and to all creditors and interested parties, in the above captioned case.

RESPECTFULLY SUBMITTED. In San Juan, Puerto Rico, this 14<sup>th</sup> day of October, 2016.

/s/ Roberto A. Figueroa Colón ROBERTO A. FIGUEROA COLON USDC #300105 FIGUEROA & SERRANO, PSC PO BOX 1635 GUAYNABO PR 00970-1635 TEL NO. (787) 744-7699

## Case: 10-04402-DIXI. Label Matrix for local noticing Document BANCO POPULAR PR FORTUNO & RIVERA FONT LLC Case:16-04482-BKT7 Doc#:40 Filed:10/14/16 Entered:10/14/16 09:40:02 Desc: Main Document Page 3 of 3

District of Puerto Rico Old San Juan Fri Oct 14 09:29:39 AST 2016

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

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